

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

TANIELLE SHURNEY,

NO 05-196

Plaintiff,

(ERIE)

vs.

SCOTT'S ECONO INN, INC.,  
SCOTT'S SPLASH LAGOON, INC.

SEAN PIERCE, INDIVIDUALLY  
AND IN HIS CAPACITY AS  
TROOPER OF THE PENNSYLVANIA  
STATE POLICE

JOHN DOE, INDIVIDUALLY AND IN  
HIS CAPACITY AS THE SUPERVISOR  
OF TROOPER SEAN PIERCE OF THE  
PENNSYLVANIA STATE POLICE,

Defendants.

ANSWER TO AMENDED COMPLAINT

AND NOW, comes the defendant, Scott's Econo Inn, Inc., by its attorneys, BASHLINE & HUTTON, and Gerald J. Hutton, Esquire and states that it has a full, just, complete and legal defense to the allegations contained in the plaintiff's Amended Complaint and in support thereof sets forth the following:

In answer to Plaintiff's Amended Complaint, defendant Scott's Econo Inn, Inc., expressly incorporates by reference, the Answer previously filed on its behalf in this action, First Defense through Twelfth Defense, paragraphs 1 through 31 inclusive, as though said Answer were set forth at length and in full here.

WHEREFORE, defendant Scott's Economy Inn, Inc., demands that judgment be entered in its favor with costs in its behalf sustained.

JURY TRIAL DEMANDED.

DATE: August 29, 2005

Respectfully Submitted,  
BASHLINE & HUTTON

BY

  
GERALD J. HUTTON, ESQ.,  
PA. I.D. # 23098  
ATTORNEY FOR DEFENDANT  
SCOTT'S ECONO INN, INC.

ONE OLIVER PLAZA  
210 SIXTH AVUE, SUITE 3500  
PITTSBURGH, PA 15222

Tel. (412)434-0201

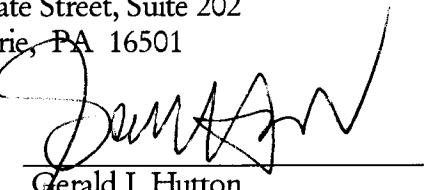
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Answer was served via U.S. First Class Mail, postage pre-paid, on this 16<sup>th</sup> day of September, 2005, upon the following counsel of record:

*(Attorney for Plaintiff)*  
Adams, A.J. Esq.  
602 West 9TH Street  
Erie, PA 16502

*(Attorney For Trooper Sean Pierce)*  
Christian D. Barefoot,  
Office of Attorney General  
6<sup>th</sup> Floor Manor Complex  
564 Forbes Avenue  
Pittsburgh, PA 15219

*(Attorney For Scott's Splash Lagoon, Inc.)*  
Gary D. Bax, Esq.  
900 State Street, Suite 202  
Erie, PA 16501

  
Gerald J. Hutton  
Attorney for Defendant,  
Scott's Econo Inn, Inc.